

REMARKS/ARGUMENTS

The claims are 1-22. Claim 1 has been amended to better define the invention, claim 23 has been canceled, and the remaining claims 2-22 have been amended to improve their form. In addition, claim 10 has been amended to depend on claim 8, claim 12 has been amended to depend on claim 10, and claim 14 has been amended to depend on claim 12. Support for the claims may be found, *inter alia*, in the disclosure at page 1, second and third full paragraphs, the paragraph bridging pages 3-4, page 4, first, second and third full paragraphs, page 7, first full paragraph, page 9, second, third and seventh full paragraphs, pages 13-14, and the drawings. Reconsideration is expressly requested.

Claims 1-23 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for the reasons set forth on page 2 of the Office Action.

In response, Applicants have canceled claim 23 and have amended the remaining claims 1-22 to improve their form. It is respectfully submitted that all currently pending claims fully comply with 35 U.S.C. 112, second paragraph, and Applicants

respectfully request that the rejection on this basis be withdrawn.

Claims 1-4, 7-10, 12-15 and 17 were rejected under 35 U.S.C. 102(b) as being anticipated by *Morrison et al. U.S. Patent Application Publication No. 2001/0038228*. Claims 1-3, 5, 16 and 18-23 were rejected under 35 U.S.C. 102(b) as being anticipated by *Furuyama et al. U.S. Patent Application Publication No. 2002/0047289*. Claim 6 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Furuyama et al.* in view of *Yagishita et al. U.S. Patent No. 5,934,730*. Claim 11 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Morrison et al.* in view of *Whitehead et al. U.S. Patent No. 6,422,640*.

In response, Applicants have canceled claim 23, and have amended claim 1 to better define the invention, and respectfully traverse the Examiner's rejection for the following reasons.

As set forth in claim 1 as amended, Applicants' invention provides a supporting module with waterproof seal for vehicle doors with a cable window lift mechanism. The supporting module includes a non-structural, non decorative flexible laminar element to separate a wet area from a dry area of the door and

seal mounting accesses to the inside of the door. The flexible laminar element includes a plurality of upper orifices and bears during the mounting operations on the door at least window lift mechanisms and a support spacer that allows a structural attachment of a door handle of the door and the door itself, so that when the flexible laminar element is positioned on the door, the window lift mechanisms, the support spacer, and the door handle are placed in their mounting position. Once these elements are definitively attached to the door, the loads to which they are subjected during their use are transmitted only to the door itself. In this way, Applicants' invention provides a supporting module which simplifies the mounting tasks of several functional elements for motor vehicle doors.

Applicants' supporting module as recited in claim 1 as amended, includes a flexible laminar element which is not structural, that is, it does not support any structural efforts. The supporting module serves only for supporting different elements (at least a window lift mechanism and a support spacer) during its transportation. Once the supporting module is mounted on the door itself, the functional elements supported on the door module are joined to the structure of the door, this door

structure being the part on which are transmitted the efforts made by the functional elements.

Because the supporting module is not a structural part on which the functional elements (window lift mechanism and support spacer) transmit the efforts, the laminar element can be flexible and simple in construction and manufactured with low cost materials without any precise technical requirements.

In addition, because the supporting module is not structural, several beneficial features are achieved in connection with the mounting process and the functional elements. For example, as discussed at page 1, second full paragraph of Applicants' disclosure, the non-structural flexible laminar element has sufficient supporting capability to allow mounting various door components on it for the subsequent installation of the entire module on such door. This assembly or module provides the waterproof sealing function, separating the dry and wet parts of the door.

In addition, because the door plays the structural role, the cost of the material used to manufacture a laminate element of the module may be reduced. See page 1, third full paragraph of

Applicants' disclosure.

The supporting nature of the module means that it is strong enough to support the components it incorporates during its assembly on the door, but it does not contribute to the structural strength of the door. Each element requiring a structural attachment, such as the window lift rails, the lock or the door handle, must transmit the loads directly to the door structure, so that they are attached to the door structure and thus must be provided with the necessary anchoring means to the door. Likewise, the door is provided with a structural part for anchoring these elements. The supporting module does, however, help position the components it includes that must be anchored to the door. See page 4, first and second full paragraphs of Applicants' disclosure.

Thus, Applicants' supporting module as recited in claim 1, as amended, does not play any structural role, but rather is only strong enough to support the components during its transportation and mounting.

Morrison et al. is just to the contrary. For example, paragraphs [0014], [0046], and [0047] of *Morrison et al.* clearly

show that the support module disclosed in *Morrison et al.* is a structural support module which seeks to provide structural support to a vehicle door frame. In contrast, Applicants' supporting module includes a non-structural flexible laminar element and provides a waterproof seal, which it is respectfully submitted clearly distinguishes Applicants' supporting module as recited in claim 1 as amended from the supporting module disclosed in *Morrison et al.*

Furuyama et al. discloses a supporting module that is seen by a user when he or she is inside a vehicle. To this decorative supporting module are joined some structural elements such as a window lift mechanism and a sealing screen in such a way that when the decorative supporting module is mounted on the door, these functional elements are joined permanently on the resistant structure of the door.

In contrast, Applicants' supporting module as recited in claim 1, as amended, includes a non-structural flexible laminar element which at the same time is a sealing laminar element. On this sealing non-structural flexible laminar element, the functional elements are mounted provisionally, only for being transported and mounted on the door structure, and once the functional elements are fixed to the door structure, it is the

door itself that receives the efforts transmitted by the functional elements. Applicants' sealing non-structural flexible laminar element once it has been mounted is covered by a decorative element such a door trim. Compare FIGS. 1 and 3 of Applicants' disclosure with FIGS. 2 and 4 of *Furuyama et al.* reproduced below.

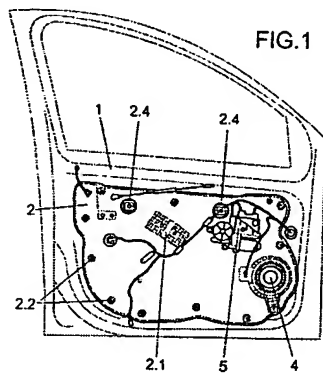


FIG. 1

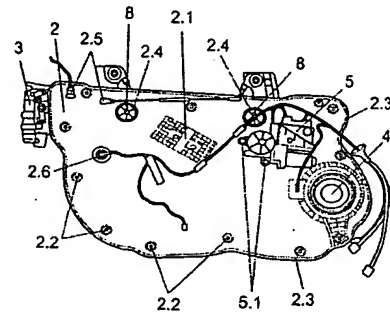


FIG. 3

Decorative
support module
(door trim)

FIG. 2

Sealing screen
(30)

Decorative
support module

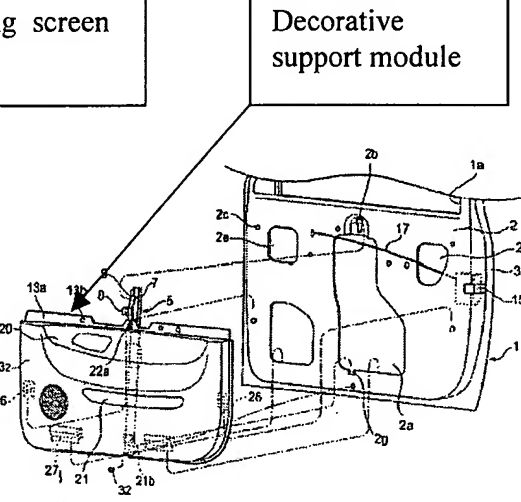
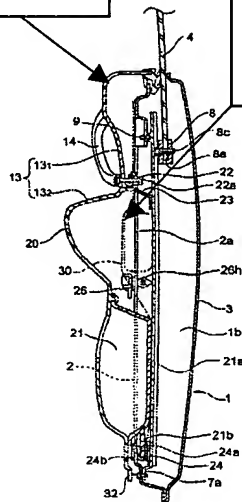


FIG. 5

In *Furuyama et al.*, the decorative support module is the door trim itself and it requires an additional sealing screen (30). In contrast, Applicants' support module itself serves as a sealing element. A separate or additional sealing element is not needed.

Therefore, Applicants' non-structural element as recited in claim 1 as amended, apart from being used as a non-structural supporting means, also fulfills sealing functions at the same time, separating the wet area from the dry area. The support module (door trim) of *Furuyama et al.* requires an additional sealing element. In other words, *Furuyama et al.* requires an additional sealing element apart from the functional elements and the supporting module.

Another aspect of Applicants' support module as recited in claim 1 as amended which should also be taken into consideration is that aside from the closures or lids that seal the access openings, Applicants' flexible laminar element is a single one piece without partitions. In *Furuyama et al.*, the equivalent piece (door trim) is divided in two parts: an upper part and a lower part. This difference derives from providing Applicants' supporting module as recited in amended claim 1 with access openings or orifices (2.4) for facilitating the mounting of the

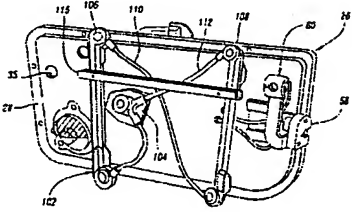
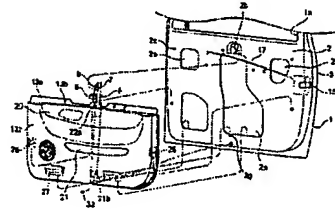
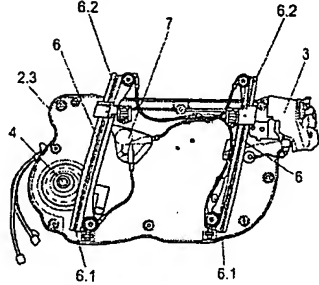
window on the window lift rails. These orifices (2.4) are afterwards covered with lids (8). See paragraphs [0021], [0062], and [0082] through [0092] on pages 4, 9 and 13-14 of Applicants' disclosure. In other words, *Furuyama et al.*, in order to fix the functional elements to the door structure, requires the door trim to be split in two parts. Otherwise, it would be impossible to fix the functional elements on the door structure. See paragraphs [0015] and [0059] of *Furuyama et al.*, and compare with Applicants' disclosure at page 1, first and second full paragraphs.

In summary, Applicants' supporting module as recited in claim 1 as amended, includes a flexible laminar element which is a sealing element whereas in *Furuyama et al.* an additional element or a screen element is required. In addition, Applicants' supporting module as recited in claim 1, as amended, is not a decorative module, whereas in *Furuyama et al.* the supporting module is the door trim itself. Finally, in Applicants' supporting module as set forth in claim 1 as amended, the flexible laminar element is substantially a single piece without partitions whereas in *Furuyama et al.* the supporting module requires a double set of pieces: an upper trim 13₁, for covering the upper part of the inner panel 2 and a lower trim 13₂ for covering the intermediate part and the lower part of the

inner panel. See paragraph [0049] of *Furuyama et al.*

The differences between Applicants' supporting module as recited in claim 1 as amended, and the constructions of *Morrison et al.* and *Furuyama et al.*, are set forth below in the summary table.

SUMMARY TABLE

<p>MORRISON ET AL. US20010038228</p>		<ul style="list-style-type: none"> - NON-DECORATIVE - STRUCTURAL SUPPORTING MODULE.
<p>FURUYAMA ET AL. US20020047289</p>		<ul style="list-style-type: none"> - DECORATIVE PANEL - NON-STRUCTURAL PANEL - SPLIT IN TWO PARTS (13₁, 13₂)
<p>APPLICANTS' INVENTION</p>		<ul style="list-style-type: none"> - NON-DECORATIVE PANEL - NON-STRUCTURAL PANEL

The remaining references to *Yagishita et al.* and *Whitehead et al.* recited with respect to claims 6 and 11, respectively, have been considered but are believed to be no more pertinent. None of these references discloses or suggests a supporting module having the structure recited in Applicants' claim 1, as amended, or teaches the benefits that are achieved from that structure.

Accordingly, it is respectfully submitted that Applicants' claim 1 as amended, together with claims 2-22, which depend directly or indirectly thereon, are patentable over the cited references.

In summary, claims 1-22 have been amended, and claim 23 has been canceled. In view of the foregoing, it is respectfully requested that the claims be allowed and that this case be passed to issue.

Applicants also submits herewith a Second Supplemental
Information Disclosure Statement.

Respectfully submitted,
David GÓMEZ CÁMARA ET AL.

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Enclosure: Second Supplemental Information Disclosure
 Statement

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